

Guzman, Cindy@DSS

From: Brooks, Darleen A., SSA [DABrooks@acgov.org]
Sent: Wednesday, April 02, 2008 9:23 AM
To: Guzman, Cindy@DSS
Subject: CDSSAlameda County 2008 Corrective Action Response.doc

DISSIMINATION OF INFORMATION

FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

Informational Element	Corrective Action/Timeline
<u>Distribution of CDSS' Pub 13 (Findings)</u> Alameda County shall ensure that Pub 13 pamphlet, "Your Rights Under California Welfare Programs" is both given and explained to program participants in all of the programs which CDSS has oversight responsibility.	Pub. 13 "Your Rights Under California Welfare Programs" are provided in the waiting rooms at all facilities. The Civil Rights Officer will remind staff through the agency on-line bulletin board where to access Pub. 13 pamphlets. The Civil Rights Officer will conduct random site visits to ensure Pub. 13 pamphlets are provided to program participants.
<u>Translated Pub 13 (Findings)</u> Alameda County shall ensure that the current version of the Pub 13 is available in all languages translated by CDSS and that the available translated versions are given to the clients in their primary language.	During the Civil Rights Audit, the Civil Rights Officer provided each office with the current version of the Pub.13. Staff will be reminded through the agency bulletin board where to access Pub. 13 pamphlets on-line. The Civil Rights Officer will remind staff through the agency on-line bulletin board where to access Pub. 13 pamphlets.
<u>Auxiliary Aids (Findings)</u> Alameda County shall ensure the availability of large print, Braille, and auditory aids for participants in all the programs for which CDSS has oversight responsibility.	During the Civil Rights Audit each department was provided with large print, Braille, and auditory aids for participants. The Civil Rights Officer will re-issue the Civil Rights Resource Guide to Department Heads, Division Directors and Program Managers to distribute to all staff. The Civil Rights Resource Guide is a valuable resource tool.
<u>Posters (Findings)</u> Alameda County shall ensure that the most current version of posters on nondiscrimination provided by CDSS and USDA are prominently displayed in all waiting areas and reception rooms.	During the Civil Rights Audit each department was provided and displayed the most current version of nondiscrimination posters provided by CDSS and USDA.
<u>Directional Signage (Findings)</u> Alameda County shall ensure that instructional and directional signs are posted in waiting area and other places that are frequented by clients and that where such areas frequented by a substantial number of non-English speaking clients, such signage shall be translated into appropriate languages.	Each agency department has instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English speaking clients.

*7/20/08
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Facility Location: 39155 Liberty

<p>Parking –(Findings) There is no “unauthorized parking signage at entrance to off street accessible parking. Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space.</p>	<p>Corrective Action/Timeline</p> <p>Completed March 21, 2008</p>
<p>Parking – Sign shall be 17” by 22” min. in size with lettering 1” min. high stating: “Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner’s expense. Towed vehicles may be reclaimed at ____ or by telephoning _____. Gate street side parking needs access aisle on passenger side of van space. One in every 8 accessible spaces and no less than 1 shall be served by an access aisle 96” wide minimum placed opposite the driver’s side and shall be designated Van-Accessible. Gate street side, space #1 on left side does not have free standing pole with (ISA) International Sign of Accessibility. Sign height shall be 80” minimum from bottom of sign to top of finish grade. Wall signage shall be centered 36” minimum above grade, ground, or sidewalk at the interior end of space.</p>	<p>Will be completed by April 14, 2008 (The City of Livermore is currently working on these issues)</p>
<p>Exterior-The program entrance door had a door pressure too heavy at 10 lbs. Force to open doors, exterior and interior is 5 pounds maximum. Outside signage-Program Entrance needs ISA sign at entrance. A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features.</p>	<p>Will be completed by April 14, 2008 (The City of Livermore is currently working on these issues)</p>
<p>Men’s Restroom-Accessible signage needed on the door. Door sign and wall sign shall be 60” above the floor. Door pressure was too heavy at 10 lbs. Interior Door will have 5 pounds maximum pressure. Soap dispenser is too high at 42 ½. If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40”.</p>	<p>Will be completed by April 14, 2008 (The City of Livermore is currently working on these issues)</p>
<p>Women’s Restroom-Accessible signage needed on the door. Door sign and wall sign shall be 60” above the floor. Door pressure too high at 10lbs. Interior Door will have 5 pounds maximum pressure.</p>	<p>Will be completed by April 14, 2008 (The City of Livermore is currently working on these issues)</p>
<p>Emergency Egress- Had audible Alarm, but no visual. If emergency warning systems are required, they shall activate a means of warning the hearing impaired.</p>	<p>Will be completed by April 14, 2008 (The City of Livermore is currently working on these issues)</p>

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Facility Location:
Foothill Blvd.

Facility Element (Findings)	Corrective Action/Timeline
Parking/Shared (Exterior Entrance) –Both sets of doors to the main lobby from the parking lot had door pressures that exceeded 5 lbs. (18 and 11 lbs.) Force to open doors, exterior and interior is 5 pounds maximum.	Completed March 21, 2008
Outside signage (ISA) International Symbol of Accessibility sign is missing at both entrances. A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features	Will be completed by April 11, 2008
Men's Restroom- Soap dispenser too high at 42". If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40".	Will be completed by April 11, 2008
Women's Restroom –Soap dispenser too high at 42". If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40".	Will be completed by April 11, 2008

Facility Location: 401 Broadway

Facility Element (Findings)	Corrective Action/Timeline
Client lobby/City Parking- 2 nd Floor program lobby does not have an accessible table or counter. Height of accessible tables or counters is between 28"-34" from floor finish	Completed March 28, 2008
Men's Restroom- Soap dispenser too high at 49". If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". Toilet tissue dispenser located too far away at 17". Toilet tissue dispensers are located on the wall within 12" of front edge of toilet seat. Women's Restroom- Accessible Signage was too high to measure. Door sign and wall sign shall be 60" above the floor. Threshold- Needs signage in all threshold languages.	Completed March 4, 2008

Facility Location:
24100 Amador Street

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Program Manager Surveys, Staff Interviews and Case File Reviews

Findings	Corrective Actions/ Timeline
Facility Element (Findings)	Corrective Action/Timeline
Parking/Shared Parking- Exterior-2nd Floor Program Entrance door to Children's Services Program door too heavy at 11 lbs. Force to open doors, exterior and interior is 5 pounds maximum.	The door to Children and Family Services has been adjusted to conform with the 5 lbs maximum requirement.
Outside Signage -Program Entrance needs ISA sign. A sign with the International symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features.	The ISA sign has been ordered and will be installed no later than March 21, 2008.
Bilingual Staff -Alameda County shall ensure that a sufficient number of qualified bilingual employees shall be assigned to positions and locations serving a substantial number of non-English speaking persons.	In April 2003, the Agency designated language cases to workers. These languages are Farsi, Vietnamese, Cantonese, Spanish and Cambodian. Each department provides a global bilingual directory for the Agency. If language needs cannot be met, we use the services of the Language Line translators.
Effective Services -Alameda County must develop and implement a policy that identifies the process to ensure services to applicants and recipients who are non-English speaking or who have disabilities.	The Agency has a policy in place. The Agency captures the number of cases by program of individuals who are identified as having a disability through the CalWIN System. The client's disability can be identified by codes, forms or aid-type noted in CalWIN.
Timely Services -Alameda County must ensure that bilingual/interpretive services are prompt and without undue delay.	The Agency has and will continue to ensure that bilingual/interpretive services are prompt and without undue delay.
Interpreter Services -Alameda County must offer and provide free interpreter services using qualified interpreters.	September 2004 the Agency developed a "Quick Reference Guide" for line staff and managers. The guide delineates the steps necessary to identify LEP clients and to connect them to bilingual staff, the Language Line, or other resources for direct interpretation services. Over 2, 000 laminated desktop guides were distributed in the fall of 2004. The department will re-emphasize the Agency's responsibility to offer and provide free interpreter services using qualified interpreters.
Use of Minors -Alameda County shall only allow the use of a minor (under the age of 18 years) to temporarily act as an interpreter under extenuating circumstances or at the specific request of the applicant/recipient.	In 2004 the department developed a release of information/Language Survey form for individuals used as interpreters to sign during meetings held with families. The department will ensure the release forms are completed and documented in the case files. Additionally, the department will ensure that minors are used only under extenuating circumstances. It is not common practice of the department to use minors.
Written Materials -Alameda County must use and provide translated forms, to include	The Department Managers will remind staff where translated forms are held/stored on how

translated notice of action forms, in the client's primary languages when translated by CDSS.	to access both printed and electronic formats. Managers will continue to monitor that translated Notice of Actions and other forms are provided to clients and used by staff. Also, English forms requiring translation are submitted to the Agency's in-house "Translation Services Program." The program currently translates Vietnamese, Spanish, Farsi, Cambodian and Chinese with a 5 to 10 day turnaround. All other languages requiring translation are sent to selected translation service vendors. This program has been in place since 2002.
Notices of Action- When the county uses translated forms and materials, such as notices of actions that contain spaces in which the county must insert information for the client, such information must be in the primary language of the client.	The Department Managers will remind staff where translated forms are held/stored on how to access both printed and electronic formats. Managers will continue to monitor that translated Notice of Actions and other forms are provided to clients and used by staff.
Auxiliary Aids- Alameda County shall ensure the availability of auxiliary aids and services to persons with impaired speech, vision or manual skills where necessary to afford such persons an equal opportunity to access program services.	During the Civil Rights Audit each department was provided with large print, Braille, and auditory aids for participants. The Civil Rights Officer will re-issue the Civil Rights Resource Guide to Department Heads, Division Directors and Program Managers to distribute to all staff. The Civil Rights Resource Guide is a valuable resource tool.

Documentation of Applicant/Recipient Case Records

Findings	Corrective Actions/Timeline
Documentation if client provided own interpreter. When applicants/recipients provide their own interpreter, the CWD shall ensure that the applicants/recipients are informed of the potential problems for ineffective communication. The CWD shall document in the case record that the applicants/recipients were so informed.	In September 2004, the department developed a release of information form for individuals used as interpreters to sign during meetings held with families. The current Language Preference Survey Form includes a section to capture this information. This information is notated in the case file.
Temporary use of minor (under 18 years of age) as an interpreter. When a minor (under 18 years of age) is used as an interpreter, the CWD shall so document the circumstances requiring temporary use of minors in the case record. Only under extenuating circumstances or at the specific request of the applicant/recipient shall a CWD allow a minor (under the age of 18 years) to temporarily act as an interpreter.	In 2004 the department developed a release of information/Language Survey form for individuals used as interpreters to sign during meetings held with families. The department will ensure the release forms are completed and documented in the case files. Additionally, the department will ensure that minors are used only under extenuating circumstances. It is not common practice of the department to use minors.
Documentation- of interpreter signed confidentiality statement. Consent for the release of information shall be obtained from applicants/recipients when individuals other than CWD employees are used as interpreters and the case record shall be so documented.	In 2004 the department developed a release of information/Language Survey form for individuals used as interpreters to sign during meetings held with families. The department will ensure the release forms are completed and documented in the case files. Additionally, the department will ensure that minors are used

	only under extenuating circumstances. It is not common practice of the department to use minors.
Documentation of primary language- Each agency shall ensure that case record identification shows the applicants/recipient's ethnic origin and primary language.	In 2004 the department developed the release of information/Language Survey form which identifies the recipient's ethnic origin and primary language. The department continues to utilize this form.
Documentation that bilingual services were provided- Document the method used to provide bilingual services, e.g., assigned worker is bilingual other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter.	The current Language Preference Survey forms includes a section to capture this information; however, it will be more closely monitored to ensure that it is completed.
General- Alameda County must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance.	Managers will monitor that cases are documented.

Staff Development and Training

Findings	Corrective Action/Timeline
Division 21, Civil Rights Training- Alameda County shall ensure that employees receive Division 21 Civil Rights training at the time of orientation, as well as ongoing training to ensure that public contact staff has knowledge of Division 21, including familiarization with the discrimination complaint process.	Division 21 training is provided to all employees. Classes are scheduled during induction and/or during the first 6 months of employment, and then every two years thereafter for all staff. The Staff Development & Training Consulting (HRCT) requires employees to register for classes using their employee ID number and sign the class roster. This process provides a permanent tracking to ensure that all staff has met the Division 21 mandated training requirements.
Cultural Awareness Training- Alameda County shall ensure that all public contact employees receive cultural awareness training to ensure that public contact staff has an understanding of and sensitivity to the various cultural groups in the county's population.	Division 21 training is provided to all employees. Classes are scheduled during induction and/or during the first 6 months of employment, and then every two years thereafter for all staff. The Staff Development & Training Consulting (HRCT) requires employees to register for classes using their employee ID number and sign the class roster. This process provides a permanent tracking to ensure that all staff has met the Division 21 mandated training requirements.
MEPA Training for Children's Social Workers- Alameda County shall ensure that CSW's receive MEPA training to ensure that public contact staff has knowledge of, and properly apply the placement prohibitions contained in MEPA.	The Agency ensures that new Child Welfare Workers receive MEPA training at the time of Induction. Additionally, current staff receives this training on a yearly basis.

Discrimination Complaint Procedures

Findings	Corrective Action Taken/Timeline
Discrimination Process- Alameda County shall ensure staff have knowledge of the discrimination complaint process and are able to differentiate it from other it from other	The discrimination complaint process is available on the Agency website. Staff is informed at the time of induction, and at subsequent Civil Rights training. The Civil

complaint processes.	Rights officer will remind staff through the Agency bulletin-board on where to access this information.
Civil Rights Coordinator -Alameda County shall ensure that staff is knowledgeable regarding contact information of the civil rights coordinator, at minimum, where the information can be located.	The Civil Rights Officer will remind staff that this information can be accessed on-line. The Civil Rights Officer will re-issue the Civil Rights Resource Guide to Department Heads, Division Directors and Program Managers to distribute to all staff. The Civil Rights Resource Guide is a valuable resource tool.